

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION

FILED

APR 27 2001

PEGGY B. DEANS, CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF N.C.

IN RE:

INTERNATIONAL HERITAGE, INC.

CASE NO. 98-02675-5-ATS  
CHAPTER 7

Debtor.

SECOND INTERIM APPLICATION FOR COMPENSATION FOR SERVICES RENDERED  
BY  
POORMAN-DOUGLAS CORPORATION, INC. AND REIMBURSEMENT OF EXPENSES

NOW COMES Holmes P. Harden, Trustee in the above-referenced case, and applies to the Court for authority to pay Poorman-Douglas Corporation, Inc. interim fees in the amount of Seven Thousand Seven Hundred Twenty-Five and no/100 (\$7,725.00) from August 16, 2000 through November 27, 2000 and expenses incurred in the amount of \$99.76 through September 20, 2000.

Debtor filed a voluntary petition in Chapter 7 bankruptcy on November 25, 1998. An order approving the employment of Poorman-Douglas Corporation, Inc. to review claims for duplicate, amended, administrative and priority claims and assist in drafting objections for the Trustee was entered on May 9, 2000 at a rate not to exceed \$125.00 per hour.

The court entered an order allowing first interim compensation for services performed by Poorman-Douglas Corporation, Inc. on October 23, 2000 for services rendered from May 3, 2000 through June 14, 2000 and reimbursement of expenses from June 21, 2000 through July 20, 2000.

Trustee paid Poorman-Douglas Corporation, Inc. an advance payment in the

288636


cc: Hyden  
15 P. 4-27-01/AGB

374

amount of \$10,000.00 to be applied to the final billing pursuant to their contract. Trustee must apply to the court for approval of all fees on all invoices he receives from Poorman-Douglas Corporation, Inc.

A copy of the Poorman-Douglas Corporation, Inc. bill and biographical information is attached to this Application. In the opinion of the Trustee, such fees are reasonable and just.

Respectfully submitted, this 25<sup>th</sup> day of April, 2001.



Holmes P. Harden  
Trustee for Debtors  
N. C. State Bar No. 9835  
3200 Beechleaf Court  
Post Office Drawer 19764  
Raleigh, North Carolina 27619  
Telephone: (919) 981-4000

## Poorman-Douglas Corporation

10300 Southwest Allen Boulevard  
Beaverton, OR 97005  
Telephone (503) 350-5800



Invoice # 114199

Customer # 2440

Date: 09/24/00

Please Remit To:

International Heritage, Inc.  
C/O Holmes P. Harden, Trustee  
P.O. Box 19764  
Raleigh, NC 27619

POORMAN-DOUGLAS CORPORATION  
MS34  
P.O. BOX 4300  
PORTLAND, OREGON 97208-4300

Billing Period: 8/21/00 To 9/20/00

Page: 1

DESCRIPTION	UNITS	RATE	AMOUNT
This Invoice 114199, Replaces Invoice 111125.			
Bankruptcy Services			
Consulting - (K. Wagner)	10.2	125.0000	1,275.00
Claim Copies Expense	28.2	1.0000	28.20
Delivery Charges	35	1.0000	35.00

Taxable Charges	0.00
Sales Tax	0.00

**TOTAL:** 1,338.20

Customer Copy

PLEASE PAY FROM THIS INVOICE - TERMS NET 30 DAYS

International Heritage  
Invoice 114199

DATE	NAME	DESCRIPTION	TIME	RATE	TOTAL
8/16/00	K.Wagner	Telephone call w/A.Whitfield re: status of claims analysis	0.2	\$125.00	\$25.00
8/22/00	K.Wagner	Memo to L. Isabella re: orders on secured claims, leases and executory contracts	0.2	\$125.00	\$25.00
8/22/00	K.Wagner	Research re: Debtor's information on internet; conflicting information as to bar in various creditor correspondence	0.5	\$125.00	\$62.50
9/5/00	K.Wagner	Telephone call w/J.Johnson re: status of claims analysis	0.2	\$125.00	\$25.00
9/6/00	K.Wagner	Prepare memo to Chap 7 Trustee re: claims analysis	0.5	\$125.00	\$62.50
9/7/00	K.Wagner	Updated summaries for unliquidated claims; began update for duplicate and amended claims	8.2	\$125.00	\$1,025.00
9/8/00	K.Wagner	Prepare memo to M.Moore re: claims analysis	0.2	\$125.00	\$25.00
9/13/00	K.Wagner	Telephone call w/M.Moore regarding objection reports	0.2	\$125.00	\$25.00
		<b>TOTAL</b>			<b>\$1,275.00</b>
<b>Expenses</b>					
9/20/00		Photocopies	188	\$0.15	\$28.20
9/20/00		Delivery Charges		\$35.00	\$35.00
		<b>TOTAL</b>			<b>\$63.20</b>

## Poorman-Douglas Corporation

10300 Southwest Allen Boulevard  
Beaverton, OR 97005  
Telephone (503) 350-5800



Invoice # 114197

Customer # 2440

Date: 10/24/00

Please Remit To:

International Heritage, Inc.  
C/O Holmes P. Harden, Trustee  
P.O. Box 19764  
Raleigh, NC 27619

POORMAN-DOUGLAS CORPORATION  
MS34  
P.O. BOX 4300  
PORTLAND, OREGON 97208-4300

Billing Period: 9/21/00 To 10/20/00

Page: 1

DESCRIPTION	UNITS	RATE	AMOUNT
This Invoice 114197 Replaces Invoice 111640.			
Bankruptcy Services			
Consulting (M. Moore - 4; K. Wagner - 3.2)	7.2	125.0000	900.00
Delivery Charges	35	1.0000	35.00
Billable Telephone Charges	0.08	1.0000	0.08

Taxable Charges	0.00
Sales Tax	0.00

**TOTAL:** 935.08

Customer Copy

PLEASE PAY FROM THIS INVOICE - TERMS NET 30 DAYS

International Heritage  
Invoice 114197

DATE	NAME	DESCRIPTION	TIME	RATE	TOTAL
9/18/00	K.Wagner	Prepared summary of sec & bondholder claims; prepared memo to Trustee re: same plus insider claims	1.5	\$125.00	\$187.50
9/19/00	K.Wagner	Memo to M.Moore re: claims analysis and e-mailed spreadsheet	0.2	\$125.00	\$25.00
9/19/00	M.Moore	Worked on data spreadsheet from K.Wagner	2	\$125.00	\$250.00
9/20/00	K.Wagner	Prepared memo to and reviewed memos from M.Moore re: claims objection reports	0.3	\$125.00	\$37.50
9/20/00	M.Moore	Worked on data spreadsheet from K.Wagner	2	\$125.00	\$250.00
10/13/00	K.Wagner	Prepared memo and exhibit to memo to Trustee	1.2	\$125.00	\$150.00
		<b>TOTAL</b>			<b>\$900.00</b>
<b>Expenses</b>					
9/20/00		Billable Telephone Charges	1	\$0.08	\$0.08
9/20/00		Delivery Charges		\$35.00	\$35.00
		<b>TOTAL</b>			<b>\$35.08</b>

## Poorman-Douglas Corporation

10300 Southwest Allen Boulevard  
Beaverton, OR 97005  
Telephone (503) 350-5800



Invoice # 114115

Customer # 2440

Date: 11/24/00

Please Remit To:

International Heritage, Inc.  
C/O Holmes P. Harden, Trustee  
P.O. Box 19764  
Raleigh, NC 27619

POORMAN-DOUGLAS CORPORATION  
MS34  
P.O. BOX 4300  
PORTLAND, OREGON 97208-4300

Billing Period: 10/21/00 To 11/20/00

Page: 1

DESCRIPTION	UNITS	RATE	AMOUNT
This Invoice 114115 Replaces Invoice 112073.			
Internation Heritage Bankruptcy Services			
Account Executive Consulting (M. Moore 1.5; K. Wagner - 25.4)	26.9	125.0000	3,362.50

Taxable Charges	0.00
Sales Tax	0.00

**TOTAL:** 3,362.50

Customer Copy

PLEASE PAY FROM THIS INVOICE - TERMS NET 30 DAYS

International Heritage  
Invoice 114115

DATE	NAME	DESCRIPTION	TIME	RATE	TOTAL
10/16/00	K.Wagner	Reviewed claims register and worked on resolving claims conflicts	8	\$125.00	\$1,000.00
10/17/00	K.Wagner	Prepared memo to J.Johnson re: status of open claims items	0.2	\$125.00	\$25.00
10/17/00	K.Wagner	Voice mail message to M.Moore re: numbering claims with multiple claimants	0.1	\$125.00	\$12.50
10/17/00	K.Wagner	Reviewed claims register and worked on resolving claims conflicts	8.6	\$125.00	\$1,075.00
10/27/00	K.Wagner	Reviewed e-mail memo from and phone call w/J. Derse Quasarano, counsel for Chittenden Bank re: classification of priority claim	0.3	\$125.00	\$37.50
11/3/00	K.Wagner	Prepared memo to M.Moore re: multiple claimants in single claim form	8	\$125.00	\$1,000.00
11/6/00	K.Wagner	Prepared memo to M.Moore re: form of objection exhibit	0.1	\$125.00	\$12.50
11/8/00	M.Moore	Prepared memo re: objection exhibits	1.5	\$125.00	\$187.50
11/8/00	K.Wagner	Reviewed memos from M.Moore re: objection exhibits	0.1	\$125.00	\$12.50
		<b>TOTAL</b>			<b>\$3,362.50</b>
<b>Expenses</b>					



## Poorman-Douglas Corporation

10300 Southwest Allen Boulevard  
Beaverton, OR 97005  
Telephone (503) 350-5800



Invoice # 114198

Customer # 2440

Date: 12/24/00

Please Remit To:

International Heritage, Inc.  
C/O Holmes P. Harden, Trustee  
P.O. Box 19764  
Raleigh, NC 27619

POORMAN-DOUGLAS CORPORATION  
MS34  
P.O. BOX 4300  
PORTLAND, OREGON 97208-4300

Billing Period: 11/21/00 To 12/20/00

Page: 1

DESCRIPTION	UNITS	RATE	AMOUNT
This Invoice 114198, Replaces Invoice 114116.			
International Heritage Bankruptcy Services			
Consulting/Claims Processing / Reconciliation Account Executive Consulting	17.5	125.0000	2,187.50
Expenses Billable Telephone Charges	1.48	1.0000	1.48

Taxable Charges	0.00
Sales Tax	0.00

**TOTAL:** 2,188.98

Customer Copy

PLEASE PAY FROM THIS INVOICE - TERMS NET 30 DAYS

DATE	NAME	DESCRIPTION	TIME	RATE	TOTAL
11/16/00	K.Wagner	Prepared summary of unliquidated claims for which backup liquidated amount due	1	\$125.00	\$125.00
11/21/00	K.Wagner	Identified insider claimants; began identification of preference claimants	5.3	\$125.00	\$662.50
11/27/00	K.Wagner	Completed identification of preference claimants; began review of creditor names and prepared revisions to court data	11.2	\$125.00	\$1,400.00
		<b>TOTAL</b>			<b>\$2,187.50</b>
<b>Expenses</b>					
9/20/00		Telephone Charges	1	\$1.48	\$1.48
		<b>TOTAL</b>			<b>\$1.48</b>

**POORMAN-DOUGLAS CORPORATION  
INTERNATIONAL HERITAGE  
BIOGRAPHIES**

**Karen M. Wagner**

Ms. Wagner holds a BA from UCLA and a JD from the University of West Los Angeles School of Law. She was previously employed as Trustee Administrator for three Chapter 7 Panel Trustees in the US Bankruptcy Court, Central District of California. Ms. Wagner was also previously self-employed as a Chapter 11 Consultant.

**Marc Moore**

Mr. Moore is currently the Technical Consulting Executive in the Bankruptcy Department. He has been with Poorman-Douglas for over 7 years. Mr. Moore received his Bachelor degree in electrical engineering from the DeVry Institute. His current duties include project management and database development.

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION

IN RE: )  
 )  
INTERNATIONAL HERITAGE, INC. ) CASE NO. 98-02675-5-ATS  
 ) CHAPTER 7  
 )  
 )  
Debtor. )

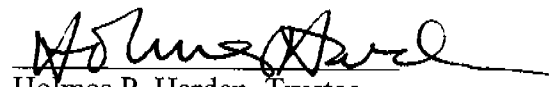
NOTICE OF SECOND INTERIM APPLICATION FOR COMPENSATION FOR SERVICES  
RENDERED BY POORMAN-DOUGLAS CORPORATION, INC. AND REIMBURSEMENT  
OF EXPENSES AND CERTIFICATE OF SERVICE

TO: ALL CREDITORS OF INTERNATIONAL HERITAGE, INC. AND OTHER PARTIES IN  
INTEREST

NOTICE IS HEREBY GIVEN of the Second Interim Application for  
Compensation for Services Rendered by Poorman-Douglas Corporation, Inc. in the amount of  
\$7,725.00 and reimbursement of expenses in the amount of \$99.76, filed simultaneously  
herewith by Holmes P. Harden, Trustee.

An objection to the fees requested should be filed with the Clerk, U. S.  
Bankruptcy Court, Post Office Box 1441, Raleigh, North Carolina 27602 with a copy served on  
the trustee whose name appears at the bottom of this Notice within twenty (20) days of the date  
of this Notice. No hearing will be conducted on said objection unless the Court, in its discretion,  
deems a hearing necessary, or unless a hearing is requested by the party filing such request. Any  
party requesting a hearing shall appear at said hearing in support of such request or he may be  
assessed with costs.

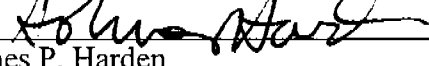
DATE OF NOTICE: 4/25/01

  
Holmes P. Harden, Trustee  
N. C. State Bar No. 9835  
Post Office Drawer 19764  
Raleigh, North Carolina 27619

CERTIFICATE OF SERVICE

I, Holmes P. Harden, do hereby certify that the foregoing Second Interim Application for Payment of Services Rendered by Poorman-Douglas Corporation, Inc. was served upon all parties of record by mailing a copy thereof to each such party at the address indicated below with its proper postage attached and deposited in an official depository under the exclusive care and custody of the United States Post Office in Raleigh, North Carolina and by public notice via 888-895-8385 and 919-981-4033 and by posting on the court's web page at [www.nceb.uscourts.gov](http://www.nceb.uscourts.gov). on the 25<sup>th</sup> day of April, 2001.

MAUPIN TAYLOR & ELLIS, P.A.

BY:   
Holmes P. Harden  
N. C. State Bar No. 9835  
Post Office Drawer 19764  
Raleigh, NC 27619  
Telephone: (919) 981-4000

SERVED:

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Bankruptcy Administrator  
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Raleigh, NC 27602-3039

Patty Evans  
Poorman-Douglas Corporation, Inc.  
10300 SW Allen Blvd.  
Beaverton, OR 97006

Chittenden Bank  
c/o Louis P. Rochkind  
Jaffe, Raitt, Heuer & Weiss  
One Woodward Avenue, Suite 2400  
Detroit, MI 48226  
Via Fax: 313-961-8358

See Attached Mail Matrix and E-Mail List

**MAUPIN TAYLOR & ELLIS, P.A.**

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**FACSIMILE TRANSMISSION**

CONFIDENTIAL [ ]

RUSH [ ]

TO: **Chittenden Bank**  
**c/o Louis P. Rochkind**  
**Jaffe, Raitt, Heuer & Weiss**  
**One Woodward Avenue, Suite 2400**  
**Detroit, MI 48226**

FROM: **Holmes P. Harden**  
MAUPIN TAYLOR & ELLIS, P.A.  
POST OFFICE DRAWER 19764  
RALEIGH, NORTH CAROLINA 27619-9764  
**DIRECT DIAL #: 919-981-4011**

CITY:

DATE: April, 2001

FACSIMILE #: ~~313-961-8358~~ OUR FILE NUMBER: ~~BANK 7A-206~~

TOTAL NUMBER OF PAGES, INCLUDING COVER SHEET:

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We are transmitting from Group III equipment.

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Help #: 919/981-4063

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